

THE BLANCH LAW FIRM

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December 20, 2019

VIA ECF

Honorable Analisa Torres,
United States District Court Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: United States v. Ignacio Herrera, et al., 18-CR-00495
Application Seeking Adjournment

Dear Judge Torres:

Our law firm represents Ignacio Herrera in the above-captioned case. The matter was scheduled for Sentencing in your Court on January 6, 2020. We are requesting that the sentencing be adjourned until February 6, 2020 or a time suitable for the Court and prosecution. Our firm received the first draft of the pre-sentencing investigation report on December 5, 2019 and filed objections to the report on December 12, 2019 after having reviewed the report with Mr. Herrera. We have yet to receive a response to our objections. Furthermore, we are investigating a matter listed in the pre-sentence investigation report regarding a previous sentence imposed upon Mr. Herrera in California that does appear to be consistent with the statutory provisions of California. We are also continuing to gather information that is material and relevant to sentencing pursuant to 18 U.S.C. § 3553 which we will have in time for an adjourned sentencing date.

Also relevant is the fact that Counsel may be engaged, on or close to the current sentencing date, in negotiations and discussions that will require physical presence on a matter in the Western District of New York that was recently made death eligible by superseding indictment due to the addition of Continuing Criminal Enterprise related charges.

Counsel's office has made the government aware of the intent to seek the requested adjournment and counsel's office has been informed that "the government generally doesn't consent to these types request."

Based upon the facts contained herein, the fact that this is counsel's first request of this nature, coupled with Mr. Herrera's right to have the Court consider all relevant and accurate information pursuant to 18 USC § 3553 , counsel respectfully requests that this Court grant an adjournment of the January 6, 2020 sentencing date until February 6, 2020.

Thank you for your time and consideration

Respectfully submitted,
THE BLANCH LAW FIRM P.C

/s/Ryan Blanch Esq.
Ryan Blanch Esq.
Counsel for Ignacio Herrera


CC: Robert Sobelman, Esq. (via ecf)

GRANTED. The sentencing scheduled for January 6, 2020 is ADJOURNED to **February 6, 2020, at 2:00 p.m.**

Defendant's submissions are due two weeks prior to sentencing. The Government's submissions are due one week prior to sentencing.

SO ORDERED.

Dated: December 20, 2019
New York, New York



ANALISA TORRES
United States District Judge